**Amendments to the Drawings:**

The attached replacement and annotated sheet(s) of drawings includes changes to FIGS. 1, 2, 3A, 3B, 5, 9, 11, 12B and 15 as follows.

FIGS. 1, 2, and 5 have been amended to include descriptive textual labels.

FIG. 2 has been amended to include the reference numeral "200."

FIGS. 3A, 3B, 9, 11, 12B, and 15 have been amended in compliance with 37 C.F.R. § 1.84(h).

Attachment: Replacement Sheets
Annotated Sheets Showing Changes

## REMARKS

The Office Action mailed September 14, 2006 has been carefully considered. Reconsideration in view of the following remarks is respectfully requested.

Claims 1-50 are currently pending. No claims are allowed.

Claims 1, 19, 20, and 37 have been amended to further particularly point out and distinctly claim subject matter regarded as the invention. Support for these changes may be found in the Specification as filed. The text of claims 2-18, 21-36, and 37-43 is unchanged, but their meaning is changed because they depend from amended claims.

New claims 44-50 also particularly point out and distinctly claim subject matter regarded as the invention. Claims 44-50 are means-plus-function claims corresponding to method claims 37-43, respectively. Support for these claims may be found in the specification, ¶¶ 9-104 and FIGS. 2-15.

The First Objection to the Drawings

The drawings stand objected to as failing to comply with 37 C.F.R. § 1.84(p)(5) because they do not include the following reference sign(s) mentioned in the description: software architecture "200."[1] Submitted herewith are corrected drawings that address the Examiner's concerns. The Applicants therefore request the objection to the drawings be withdrawn.

[1] Office Action dated September 14, 2006, ¶ 2.

The Second Objection to the Drawings

The drawings stand objected to because (i) descriptive textual labels are needed in Figures 1, 2 and 5 for proper understanding of the figure at a glance; and (ii) Figures 3A, 3B, 9, 11, 12B and 15 contain partial views.[2] Submitted herewith are corrected drawings that address the Examiner's concerns regarding Figures 1, 2, 5, 3A, 3B, 9, 11, 12B and 15. The Applicants therefore request the objection to the drawings be withdrawn.

Informal Objections

Claim 20 stands objected to for having an improper dependency.[3] With this Amendment, it is respectfully submitted the claims satisfy the statutory requirements.

The 35 U.S.C. § 101 Rejection

Claims 1-43 were rejected under 35 U.S.C. 101 for allegedly being directed to non-statutory subject matter.[4] This rejection is respectfully traversed.

The Examiner states:

> The language of the claims appears to be directed to an abstract idea that does not present a concrete tangible result. Note the claims recite a step to determine additional centralized hierarchies affected by a change [see: claim 1 lines 10-11; claim 19 lines 14-15; and claim 37 line 8-9], however the body of the claim does not recite an actual update for such additional centralized hierarchies if determined that they are affected by the change.

With this Amendment, independent claims 1, 19, and 37 have been amended to recite in part updating said additional centralized hierarchies affected by the change. The Applicants therefore request the rejection of Claims 1-43 under 35 U.S.C. § 101 be withdrawn.

[2] Office Action at ¶ 3.

The First 35 U.S.C. § 112, Second Paragraph Rejection

Claims 1-43 were rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter applicant regards as the invention. This rejection is respectfully traversed.

The Examiner states:

> Regarding claim 1, the following limitation is vague: "maintaining a master set of hierarchical reference data" [see: claim 1 lines 5-8]. The term maintaining is vague and/or unclear. Also note claim 19 lines 9-12 and claim 37 lines 3-6.[5]

With this Amendment, independent claims 1, 19, and 37 have been amended to further describe the term "hierarchical reference data" with more particularity. The Applicants suggest that one of ordinary skill in the art would understand the term "maintaining" to mean "storing a current copy of" and the term is thus clear. The Applicants therefore request the rejection of Claims 1-43 under 35 U.S.C. § 112 be withdrawn.

The Second 35 U.S.C. § 112, Second Paragraph Rejection

Claims 1-43 stand rejected under 35 U.S.C. 112, second paragraph, as allegedly being incomplete for omitting essential elements, such omission amounting to a gap between the elements. This rejection is respectfully traversed.

The Examiner states:

> The omitted elements are: (1) an update of additional centralized hierarchies if affected by a change in a first centralized hierarchy; (2) applying rules to determine if

[3] Office Action at ¶ 5.
[4] Office Action at ¶ 7.
[5] Office Action at ¶ 9.

hierarchy is valid or is not valid see paragraphs 0051 through 0052 of disclosure. [6] With this Amendment, independent claims 1, 19, and 37 have been amended to recite in part updating said first centralized hierarchy based on said change. Independent claims 1, 19, and 37 have also been amended to recite in part updating said additional centralized hierarchies affected by the change. Independent claims 1, 19, and 37 have also been amended to recite in part applying one or more rules to said first centralized hierarchy and said additional centralized hierarchies to validate the change in the first centralized hierarchy and the additional centralized hierarchies. Accordingly, the Applicants request the rejection of Claims 1-43 under 35 U.S.C. § 112 be withdrawn.

The First 35 U.S.C. § 102 Rejection

Claims 1, 19 and 37 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Kramer.[7] [8] This rejection is respectfully traversed.

According to the M.P.E.P., a claim is anticipated under 35 U.S.C. § 102(a), (b) and (e) only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.[9]

Claim 1

Claim 1 as presently amended recites:

---

[6] Office Action at ¶ 10.
[7] U.S. Patent No. 6,216,140 to Kramer.
[8] Office Action at ¶ 12.
[9] Manual of Patent Examining Procedure (MPEP) § 2131. See also *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

A computer program product comprising a set of computer instructions stored on a computer readable storage medium, said set of computer instructions comprising instructions executable to:
maintain a master set of hierarchical reference data, wherein the master set of hierarchical reference data represents reference data from hierarchies for multiple subscribing systems;
receive a change to a first centralized hierarchy;
update said first centralized hierarchy based on said change;
determine additional centralized hierarchies affected by the change;
update said additional centralized hierarchies affected by the change; and
apply one or more rules to said first centralized hierarchy and said additional centralized hierarchies to validate the change in the first centralized hierarchy and the additional centralized hierarchies.

The Examiner states:

> Regarding claim 1, Kramer teaches a computer program product comprising a set of computer instructions stored on a computer readable storage medium, said set of computer instructions comprising instructions executable to: maintain a master set of hierarchical reference data, wherein the master set of hierarchical reference data represents reference data from hierarchies for multiple subscribing systems [note: A methodology ensures the efficient management of large amounts of hierarchically organized information. The efficient comparison of two or more hierarchies of items of files and directories is provided. Hierarchically organized information is maintained. See abstract; also note Figure 1]; receive a change to a first centralized hierarchy [note: The methodology allows a target version of a hierarchy to be automatically updated by default action with changes made in a source version of the hierarchy as a function of identifying the common ancestor abstract; col. 5 lines 38-51; col. 6 lines 50-61]; determine additional centralized hierarchies affected by the change [note: col. 7 lines 6-39]; and validate the change in the first centralized hierarchy and the additional centralized hierarchies [note: recursion operation col. 7 line 46 through col. 8 line 25; various default actions may be implemented col. 9 line 20 through col. 10 line 46].[10]

The Applicants respectfully disagree. Contrary to the Examiner's statement, Kramer does not disclose or suggest validating the change in the first centralized hierarchy and the additional centralized hierarchies. In support of the Examiner's contention, the Examiner refers to a portion of Kramer that describes a processes for determining differences between items in two or more hierarchies. Whereas Claim 12 as presently amended requires the application of one or more

rules to said first centralized hierarchy and said additional centralized hierarchies to validate the change in the first centralized hierarchy and the additional centralized hierarchies. Kramer discloses merely determining *differences* between hierarchies; no mention is made of *validating* a *change* in both a first centralized hierarchy and additional centralized hierarchies. Therefore, each and every element as set forth in Claim 1 is not found in Kramer. Accordingly, the 35 U.S.C. § 102 rejection of Claim 1 based on Kramer is unsupported by the art and must be withdrawn.

Additionally, Kramer does not disclose maintaining a master set of hierarchical reference data, wherein the master set of hierarchical reference data represents reference data from hierarchies for multiple subscribing systems, said hierarchical reference data comprising reference data for use in enforcing criteria regarding the form in which data in a database is reported to a user, organized to reflect interrelationships between reference data, as required by Claim 1. Kramer is directed to a system for software configuration management, where the software code for a particular version of a software application is represented as a hierarchy of files containing software code. The data in the hierarchy of Kramer says nothing about the form in which data in a database is reported to a user. With this Amendment, Claim 1 has been amended to make this distinction more clear. For this additional reason, the 35 U.S.C. § 102 rejection of Claim 1 based on Kramer is unsupported by the art and must be withdrawn.

[10] Office Action at ¶ 12.

Independent Claims 19 and 37

Independent claims 19 and 37 include limitations similar to Claim 1. Claim 1 being allowable, Claims 19 and 37 must be allowable for at least the same reasons.

In view of the foregoing, it is respectfully asserted that the claims are now in condition for allowance.

Conclusion

It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited.

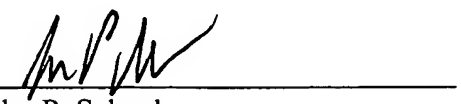
If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

The Applicants respectfully request that a timely Notice of Allowance be issued in this case. Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,

THELEN REID BROWN
RAYSMAN & STEINER LLP

Dated: January 16, 2007



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ANNOTATED SHEET

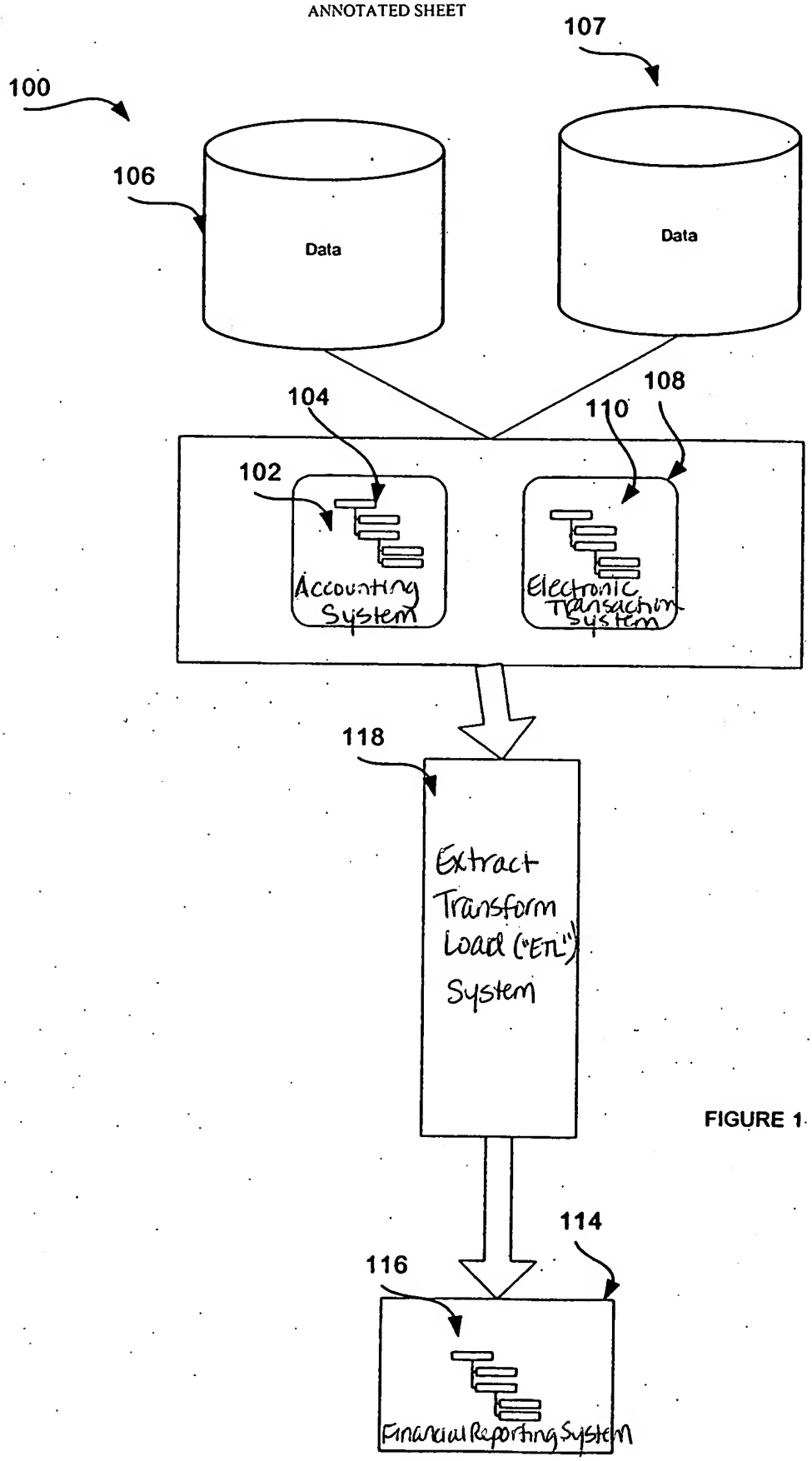


FIGURE 1

ANNOTATED SHEET

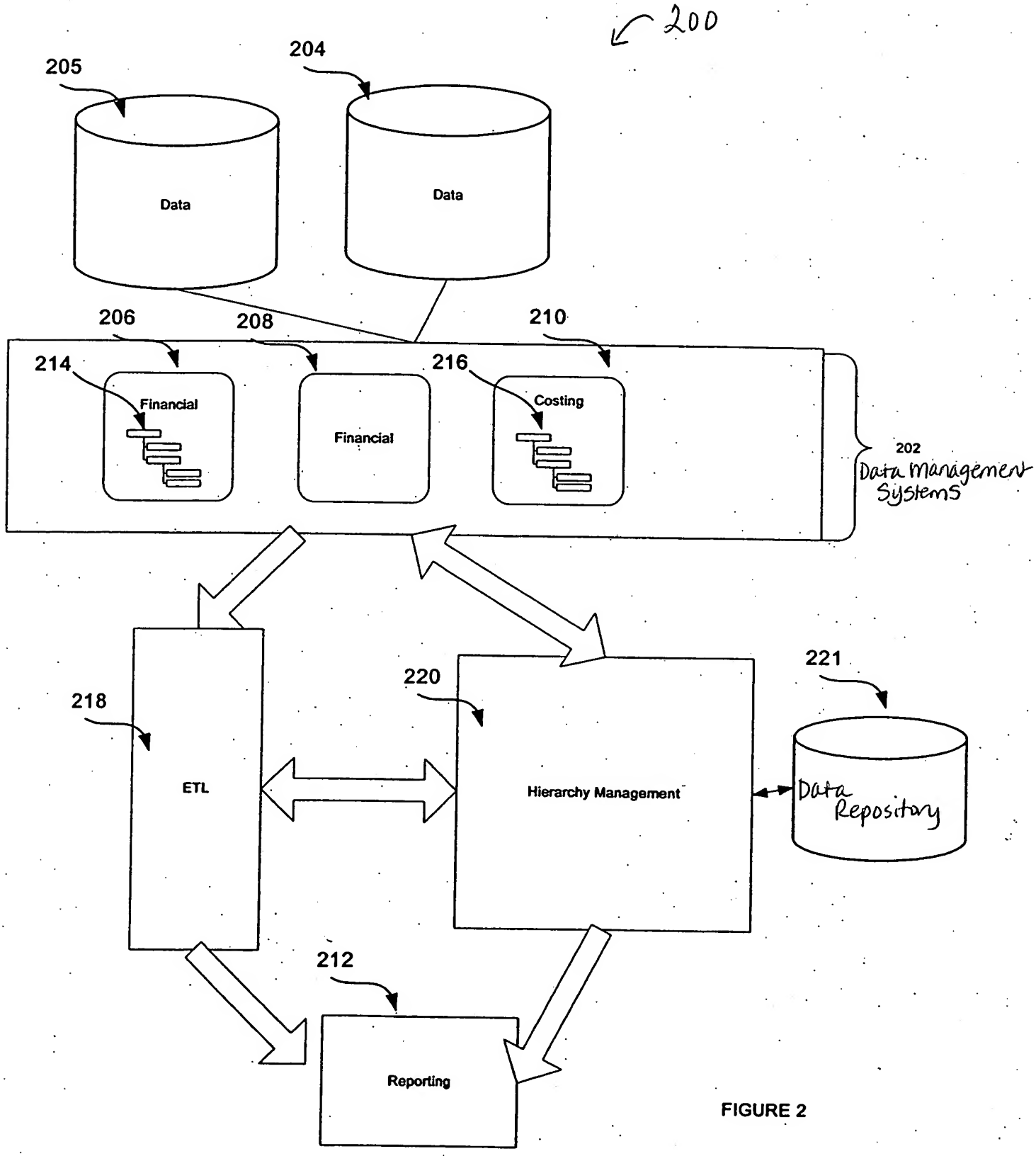


FIGURE 2

ANNOTATED SHEET

302

| Line of Business ("LOB") ID | LOB Description |
|---|---|
| 1 | Administration |
| 2 | Manufacturing |

304

| DepartmentID | DepartmentName | LOBID |
|---|---|---|
| 1 | Data Processing | 1 |
| 2 | Human Resources | 1 |
| 3 | DevelopmentDept | 1 |

306

| SectionID | SectionName | DepartmentID |
|---|---|---|
| 1 | DataEntry | 1 |
| 2 | DatabaseAdmin | 1 |
| 3 | DevelopmentSec | 3 |

308

| CostCenterGroupID | CostCenter | SectionID | CountryID |
|---|---|---|---|
| 1 | 3333 | 1 | 1 |
| 2 | DE3 | 1 | 2 |
| 3 | 3221 | 3 | 1 |
| 4 | 33555 | 3 | 1 |
| 5 | 45128 | 3 | 1 |
| 6 | 45444 | 3 | 1 |
| 7 | ChinaAdmin | 3 | 1 |

310

| CostCenterMemID | CostCenterMemName | CostCenter |
|---|---|---|
| 1 | 3333a | 1 |
| 2 | 788777 | 2 |
| 3 | 99222 | 2 |
| 4 | 9987553 | 2 |
| 5 | 999999 | 2 |
| 6 | EastAdmin | 2 |
| 7 | UnitA-B | 2 |

312

| ExpenseID | Amount | Date | CostCenterMem | CostCenter |
|---|---|---|---|---|
| 1 | 245 | 1/22 | 1 | 1 |
| 2 | 210 | 1/24 | 2 | 2 |

FIGURE 3A

FIGURE 3A

ANNOTATED SHEET

314

| AreaCode | Area |
|---|---|
| 1 | Asia |
| 2 | Europe |
| 3 | Joint Venture |
| 4 | United States |

316

| Region | RegionName | Area |
|---|---|---|
| 1 | AsiaSE | 1 |
| 2 | AsiaSW | 1 |
| 3 | EasternEurope | 2 |
| 4 | Western Europe | 2 |

318

| CountryID | CountryName | Region |
|---|---|---|
| 1 | China | 1 |
| 2 | England | 3 |

FIGURE 3B

FIGURE 3B

(move)

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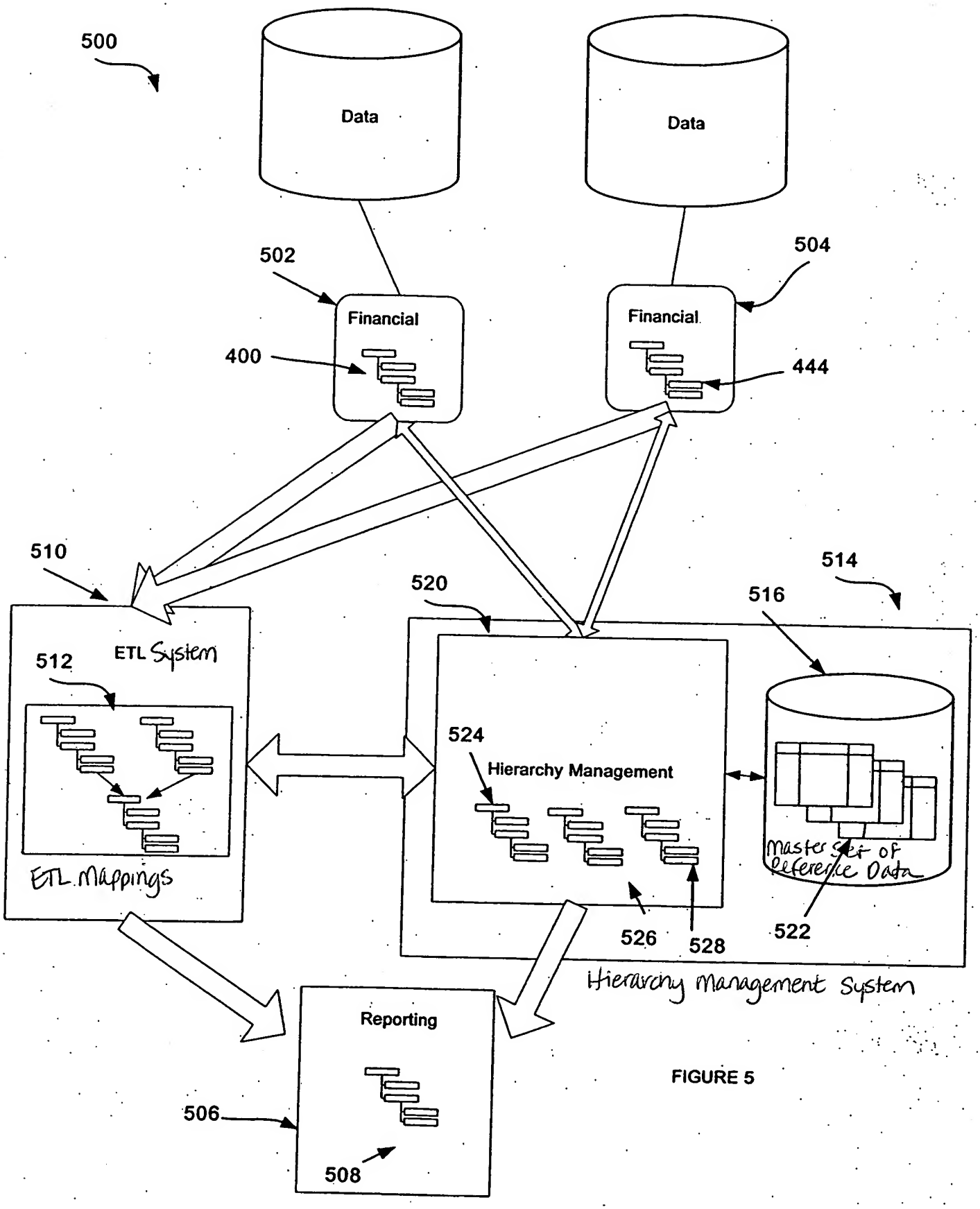


FIGURE 5

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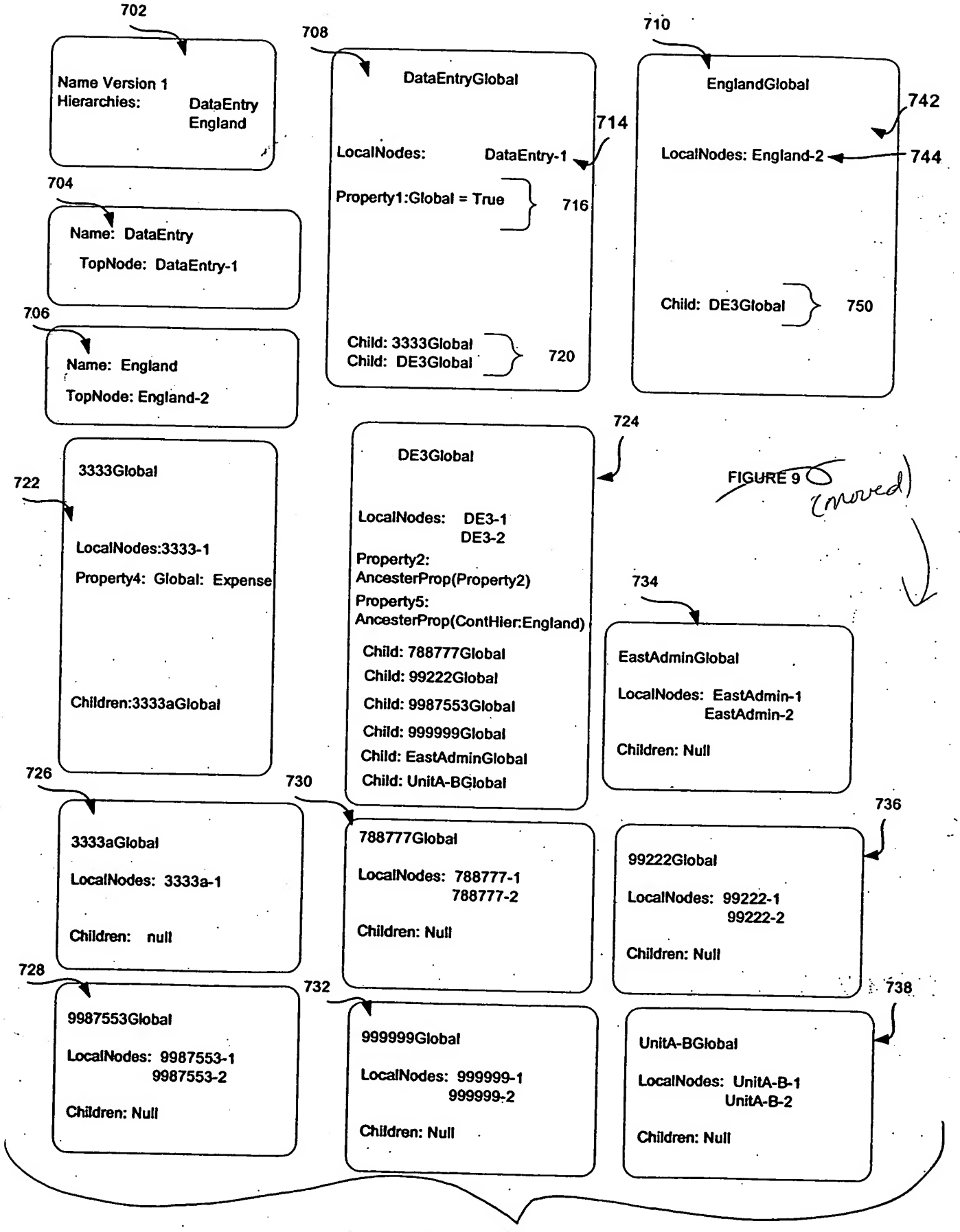


FIGURE 9 (moved)

FIGURE 9

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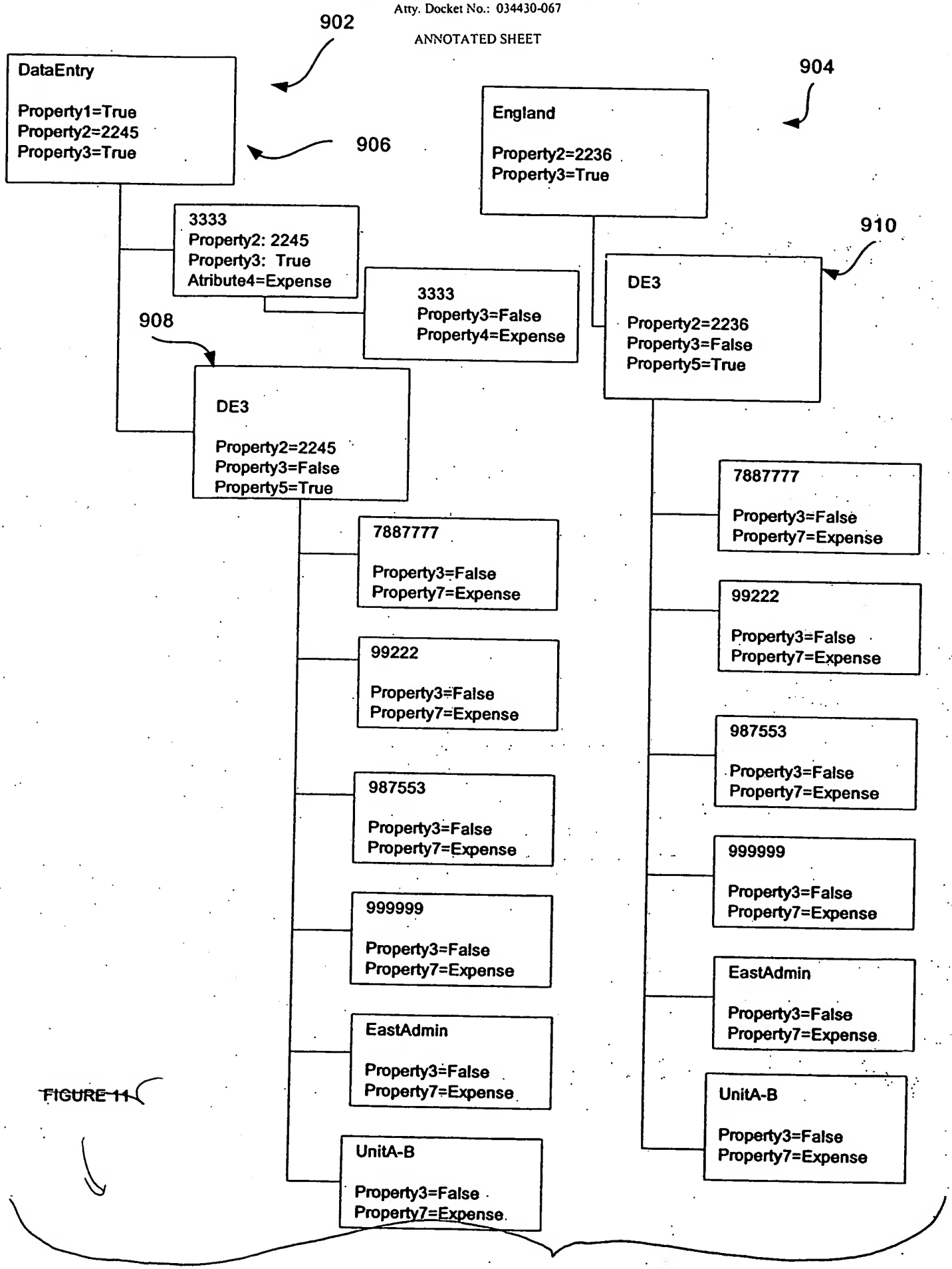


FIGURE 11

FIGURE 11

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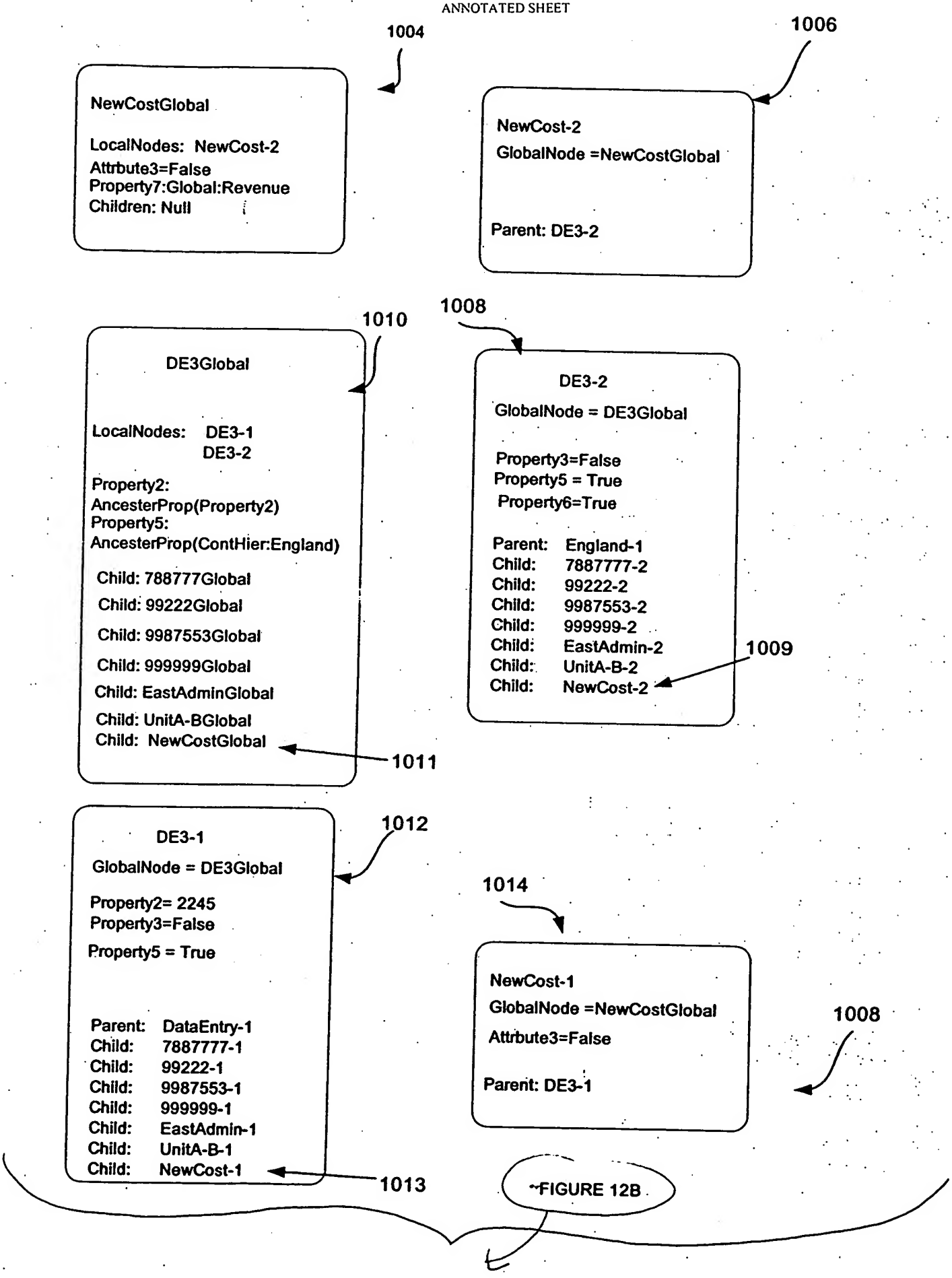


FIGURE 12B

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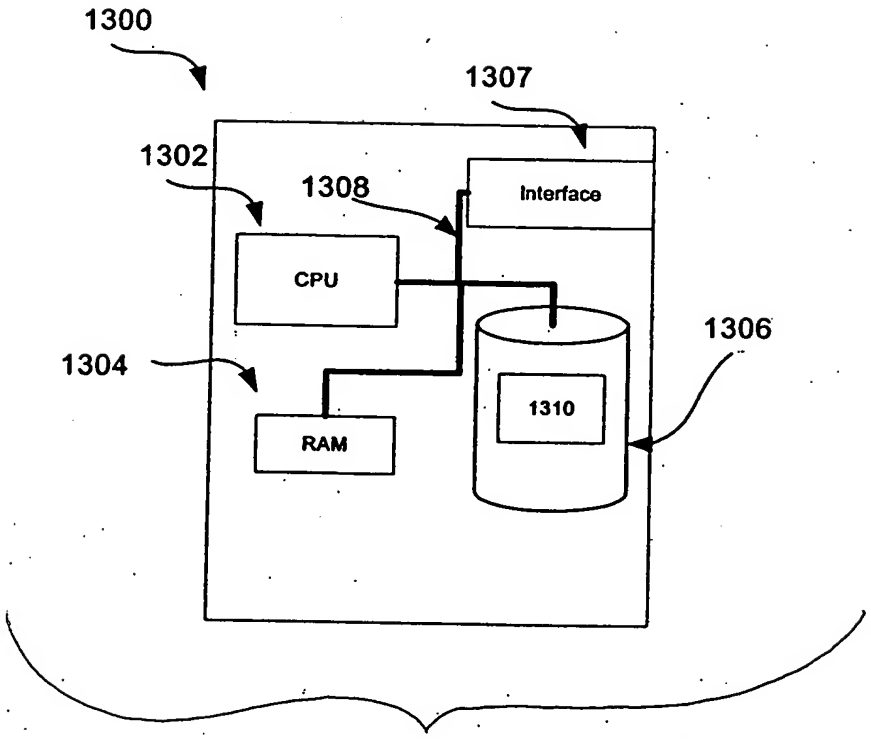


FIGURE 15